

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

NICOL JACKSON,

Plaintiff,

v.

**KINGDOM HALL OF JEHOVAH
WITNESS, *et al.*,**

Defendants.

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Case No. 1:22-cv-01133-STA-jay

Chief Judge Anderson

Magistrate Judge York

**UNOPPOSED MOTION TO SET DEADLINE TO RESPOND TO AMENDED
COMPLAINT AND MEMORANDUM IN SUPPORT**

Defendants Watch Tower Bible and Tract Society of Pennsylvania, Watchtower Bible and Tract Society of New York, Inc., and Paris TN Congregation of Jehovah’s Witnesses (collectively, “Defendants”) file this unopposed motion to set July 29, 2022 as the deadline for Defendants to answer or otherwise respond to Plaintiff’s last amended complaint. *See* Fed. R. Civ. P. 6(b); L.R. 7.2.

Plaintiff originally filed this action in the United States District Court for the Middle District of Tennessee (the “Middle District”). (Docket Entry “D.E.” 1.) The initial defendants moved to transfer venue to this Court pursuant to Rule 12(b)(3) and 28 U.S.C. § 1406(a) and, in addition, under 28 U.S.C. § 1404(a). (D.E. 19, 20.)¹ Plaintiff opposed that motion and subsequently filed an Amended Complaint, adding an additional defendant. (D.E. 16, 22, 39–40.) Defendants filed an Amended Motion to Transfer pursuant to Rule 12(b)(3) and 28 U.S.C. § 1406(a) and, in addition, under 28 U.S.C. § 1404(a). (D.E. 41–42.) Then, Plaintiff responded

¹ Plaintiff did not name Watchtower Bible and Tract Society of New York, Inc. as a party in her original Complaint. (*See* D.E. 1.)

that she was no longer opposed to her case being transferred to the Western District of Tennessee. (D.E. 50.) As a result, this case was transferred to this Court under 28 U.S.C. § 1404(a). (D.E. 51.)²

Defendants' counsel below asked Plaintiff via email to agree to an extension of time to and including July 29, 2022, to answer or otherwise respond to the last amended complaint. Plaintiff has agreed. This extension not only permits Defendants to prepare their answer or other response, but it also accommodates a July family wedding for Mr. Harvey to attend.

WHEREFORE, Defendants respectfully request the Court to grant this Motion and enter the contemporaneously submitted proposed Order allowing Defendants up to and including July 29, 2022 to answer or otherwise respond to the Amended Complaint. The proposed Order is being submitted in Word to the Court's chambers.

DATED this 23rd day of June, 2022.

Respectfully submitted,

s/ Robb S. Harvey

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Congregation of Jehovah's Witnesses*

² Because the Middle District did not address Defendants' arguments under Rule 12(b)(3) and, therefore, did not deny Defendants' Rule 12 motion, it is not clear what the current deadline is for Defendants to respond to Plaintiff's Amended Complaint. See Fed. R. Civ. P. 12(a)(4)(A). Defendants file this Motion out of an abundance of caution to ensure no deadlines are missed.

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I hereby certify that my colleague/co-counsel communicated with Plaintiff by e-mail on June 21, 2022. Plaintiff has stated that she agreed to July 29, 2022 as the deadline for Defendants to answer or otherwise respond to the Amended Complaint.

s/ Robb S. Harvey _____

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed using the Court's CM/ECF System on June 23, 2022. In addition to anticipated service to Plaintiff through the Court's CM/ECF System, the undersigned will ask his team members to send a copy of this submission via email and via first-class U.S. Mail, postage pre-paid, upon Plaintiff:

Nicol Jackson
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msnicoltjackson@gmail.com

s/ Robb S. Harvey _____